

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

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In re

SECOND CHANCE BODY ARMOR, INC.,

Debtor.

Case No. HT 04-12515 [-jrh]

Chapter 11

(Jointly Administered)

THOMAS F. REILLY, as ATTORNEY GENERAL of
the Commonwealth of Massachusetts,

Plaintiff,

v.

SECOND CHANCE BODY ARMOR, INC.,
TOYOBO AMERICA, INC. and TOYOBO CO.
LTD.,

Defendant.

(Removed from the Suffolk Superior
Court; No. 03-5450)

C.A. No. _____

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**DEFENDANTS' MOTION TO TRANSFER PURSUANT TO
28 U.S.C. § 1404(a) AND REQUEST FOR HEARING**

Defendants Toyobo Co. Ltd. ("Toyobo Japan") and Toyobo America, Inc. ("Toyobo America") hereby move, pursuant to 28 U.S.C. § 1404(a), to transfer this action to the United States District Court for the Western District of Michigan.

As grounds therefor, Toyobo Japan and Toyobo America submit the Memorandum of Law in Support of Defendants' Motion to Transfer Pursuant to 28 U.S.C. § 1404(a), filed herewith.

REQUEST FOR ORAL ARGUMENT

The Toyobo defendants believe that oral argument will assist the Court in resolving the issues raised in this Motion to Transfer. For this reason, pursuant to Local Rule 7.1(D), defendants respectfully request oral argument on the motion.

Dated: November 12, 2004

TOYOBO CO. LTD. and TOYOBO
AMERICA, INC.

By their attorneys,



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CERTIFICATE OF SERVICE

I, Neil P. Motenko, hereby certify that on the 12th day of November, 2004, I caused a true and accurate copy of the within motion to be served by hand on each other party of record in the Removed Action.



Neil P. Motenko